

OCT 31 1983

Mr. James Schuman  
 Ray Schuman and Associates  
 5464 Highland Park Drive  
 St. Louis, Missouri 63110

RE: MOD009738147

Dear Mr. Schuman:

We are preparing to transfer information under the Resource Conservation and Recovery Act (RCRA) to the Missouri Department of Natural Resources (MDNR) for their assumption of the management of the Federal RCRA program in Missouri. In comparing their files with the Federal files, and in reviewing your annual report for 1981, it appears that your site has not generated sufficient hazardous waste to be regulated under either the State or the Federal waste management programs.

Your Federal annual report showed that you were a "non-handler" of hazardous waste in 1981 under the Federal program; and you have indicated to the MDNR that you currently generate less than 100 kilograms of hazardous waste per month, and thus are not regulated by the Missouri Waste Management Program. Since the Federal entry point for full regulation is 1000 kilograms per month, it appears likely that you are not regulated by the Federal RCRA system either. Both State and Federal law provide a provisional identification numbering which would allow you to dispose of a one-time batch of hazardous waste should the need arise.

Based on the above, we suggest that you contact us within 10 days and request to have your status changed to reflect your current waste management practices. Mrs. Harris of my staff will be glad to discuss your various options by telephone. She can be reached at 816-374-6534. Questions about the Missouri Waste Management Program should be addressed to them at 314-751-3241, since this letter pertains only to the Federal RCRA system and does not dismiss you from compliance with the Missouri Solid and Hazardous Waste Laws and Regulations 260.200 - 260.240 RSMo, and 260.350 - 260.430 RSMo respectively.

We will look forward to hearing from you soon.

Sincerely yours,

Robert L. Morby  
 Chief, Waste Management Branch  
 Air and Waste Management Division

cc: David Bedan, Director

Waste Management Program, MDNR

CONCURRENCES

SYMBOL	bcc: Mike Sanderson, AWC					
SURNAME	ARWM:WMBR:SPRS:B.HARRIS:jp:x6534:9/20/83					
DATE	SHES HARRIS	SPRS MORBY	WMBR MORBY			

EPA Form 1320-1 (12-70)

MCLAUGHLIN MORBY 11/1/83

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